

UNITED STATES DISTRICT COURT  
FOURTH DIVISION  
DISTRICT OF MINNESOTA

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Sandra Jean Rushing,

Plaintiff,

Civil File No. \_\_\_\_\_

vs

**NOTICE FOR REMOVAL**

Walgreen Co..

Defendant.

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TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MINNESOTA:

Petitioner\Defendant Walgreen Co., respectfully shows and alleges the  
following in support of its Petition for Removal.

1. Petitioner is the Defendant in an action commenced against them in  
Ramsey County District Court entitled *Sandra Jean Rushing v. Walgreen Co.*,  
A true and correct copy of the Summons and Complaint served upon petitioner is  
attached as Exhibit "A". No further proceedings have taken place in the state  
action.

2. Plaintiff, Sandra Jean Rushing, is and was at all relevant times a citizen  
of the State of Minnesota, Petitioner\Defendant Walgreen is and at all relevant  
times a citizen and a corporation with its principal place of business in the State  
of Illinois.

3. Complete diversity exists among the parties to this action and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332, and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

5. The Summons and Complaint in the state action was served on May 13, 2022, and Petitioner\Defendant have filed this Notice to Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioner\Defendant Walgreen Co. prays that the state action pending against them be removed to this Court.

Dated: May 19, 2022

Lind, Jensen, Sullivan & Peterson  
A Professional Association

/s/ Brian A. Wood  
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